

UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

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|--------------------------|---|--------------------|
| HYUNDAI MOTOR |) | |
| MANUFACTURING, |) | |
| |) | |
| Petitioner, |) | |
| |) | |
| v. |) | Case No.: 18-13845 |
| |) | |
| NATIONAL LABOR RELATIONS |) | |
| BOARD, |) | |
| |) | |
| |) | |
| Respondent. |) | |

UNOPPOSED MOTION FOR LEAVE TO INTERVENE
OF CHARGING PARTY

The Charging Party moves to intervene in this matter in support of Respondent NLRB. Richard Rouco initiated the Charge on behalf of Nathan Howard, Justin Clecker, and Nathan Yarbrough, which is the subject of this Petition for Review. Richard Rouco is the Charging Party before the National Labor Relations Board (“Board”) in the decision and order of the NLRB styled Murphy Oil USA, Inc., and Sheila Hobson, NLRB Case No. 10-CA-038804, reported at 361 NLRB NO. 72 and dated October 28, 2014. The Charging Party hereby moves this Court for an Order allowing him to intervene in accordance with Federal Rule of Appellate Procedure 15(d). In support of this Motion, he shows the following:

1. Richard Rouco, on behalf of Nathan Howard, Justin Clecker, and Nathan Yarbrough, filed the unfair labor practice charge which culminated in the NLRB decision and order at issue in this case. He thus has a compelling interest in the outcome of the case. *See* International Union, UAW v. Scofield, 382 U.S. 205, 208 (1965).

2. This Motion for Intervention is timely filed under Federal Rule of Appellate Procedure 15(d).

3. The Supreme Court has held that a Charging Party is permitted to intervene in these proceedings as of right. International Union, UAW v. Scofield, 382 U.S. 205, 208 (1965).

Based on the foregoing, Richard Rouco, on behalf of Nathan Howard, Justin Clecker, and Nathan Yarbrough, respectfully requests this Court for an Order granting him the right to intervene in this proceeding.

Date: October 31, 2018

/s/ Richard P. Rouco

Richard P. Rouco

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**CERTIFICATE OF INTERESTED PARTIES AND
CORPORATE DISCLOSURE STATEMENT**

COMES NOW Charging Party Richard Rouco, and pursuant to Rule 26.1, Fed.R.App.P, and Fifth Circuit Rules 27.4 and 28.2.1, submits its Certificate of Interested Parties and Corporate Disclosure Statement. Charging Party Richard Rouco, on behalf of Nathan Howard, Justin Clecker, and Nathan Yarbrough , are individuals and have no corporate affiliates or subsidiaries.

The following is a complete list of all persons and entities known to have an interest in the outcome of the appeal:

1. Amchan, Arthur J., Administrative Law Judge
2. Burr& Forman LLP, Counsel for Petitioner
3. Cleckler, Justin, Former Employee of Petitioner (named in Charge)
4. Cowan, Meryl, Counsel for Petitioner
5. Debruge, Marcel L., Counsel for Petitioner
6. Howard, Nathan, Former Employee of Petitioner (named in Charge)
7. Hyundai Motor America
8. Hyundai Motor Company, Ltd.
9. Hyundai Motor Manufacturing Alabama, LLC, Petitioner

10. Lucas, Michael L., Counsel for Petitioner
11. National Labor Relations Board
12. McKinney, M. Kathleen, Regional Director Region 15
13. Miragliotta, Andrew T., Counsel for General Counsel
14. Quinn, Connor, Weaver, Davies & Rouco LLP
15. Rob, Peter, General Counsel for the National Labor Relations Board
16. Rouco, Richard, Charging Party
17. Yarbrough, Nathan, Former Employee of Petitioner (named in Charge)

Date: October 31, 2018

Respectfully Submitted,

/s/ Richard P. Rouco

Richard P. Rouco

Charging Party on behalf of Nathan
Howard, Justin Cleckler and Nathan
Yarbrough

OF COUNSEL:
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CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with all counsel of record and the foregoing motion is not opposed by any party.

/s/ Richard P. Rouco

Richard P. Rouco

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2018, I filed Charging Party's **Unopposed Motion For Leave To Intervene** via the Court's CM/ECF system which will notice and serve the following counsel:

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/s/ Richard P. Rouco
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